

MEETING MINUTES - OU1 WORKING GROUP
DOE, EPA, CDPHE
APRIL 11, 1995

An agenda is attached and signature sheet is attached..

Attendees:

D. George, DOE
T. Reeves, DOE/SAIC
J. Hopkins, EG&G
M. Rupert, EG&G
L. Brooks, EG&G
C. Leon, D&M
G. Kleeman, EPA

L. Gunn, EG&G
F. Munter, D&M
J. Wolf, PRC
T. Peters, PRC
P. Sinton, D&M
C. Gilbreath, CDPHE
J. Krause, EG&G

D. George opened up the meeting with introductions. After introductions, he discussed the "New rules of the Game" handout. Everyone agreed to the features of the consultative process.

M. Rupert passed out copies of the ER2000 schedule. George indicated that this was the schedule that the project was currently on, but indicated that the project would probably be accelerated to present a final CAD/ROD by September 29, 1995. No accelerated schedule was provided at the meeting since final dates have not been developed. George will provide CDPHE and EPA with copies of the new schedule to review upon receipt. George then passed out and presented the budget for OU-1 for FY 96 and FY 97. In 1997, the project is budgeted to have no money, however, this assumption was based in the Preferred Alternative of using the French drain and treating the water. George indicated that there was a planning contingency in case that assumption was invalid, but DOE would have to get the money internally, and any money for OU1 would not be a budget line item.

T. Reeves made the presentation on extraction wells and DNAPLs. In summary, he indicated that Pump and Treat alternatives would never reach the remediation goals. Surfactants could be used, however, there is a risk that additional contamination could occur since the DNAPLs could become dispersed and penetrate into the bedrock. This presentation started a discussion which filtered over into the next three items of the agenda.

During the discussion, primary discussion centered not on the FS/CMS or Proposed Plan per say, but on the previous issues such as the compliance with ARAR's, Point of Compliance, and the Preferred Alternative. Data was distributed showing the results of the last 6 months of water treatment. The data showed the 891 facility was essentially treating clean water. The contamination plume has not reached the French drain. G. Kleeman asked how long DOE planned to operate the French drain. George indicated that the proposed plan was based on 30 years, but we would look at the operation at the 5-year ROD

review. Based on the Reeve's presentation, DOE could theoretically run the drain and plant forever and never achieve cleanup goals. Kleeman indicated we would be better off to go with SVE and save money in the long run and at least achieve some cleanup.

C. Leon indicated that any type of active treatment would be hard since the DNAPLs are immobile and no source or pool has been found. Kleeman countered saying it doesn't matter, DOE is already exceeding the GW ARARs (Based on State Regs.). This comment started the POC discussion. Kleeman stated that the state regulations show the POC to be the edge of the plume, not the French drain as had been proposed by DOE. DOE's argument was that by having the French drain be the POC, we would never be in violation as long as the plume never progressed down gradient of the drain, thus the Preferred Alternative is valid. The question came up as to where the actual plume was down gradient. Only limited soil gas data was available. Reeves indicated that DOE really didn't know the extent of the plume since soil gas surveys were incomplete and inconclusive down gradient, however some well data does show plume migration down gradient of the IHSS 119.1 source area.

The working group basically agreed that a.) the contamination was exceeding GW ARARs. b.) The edge of the plume probably should be the POC based on state regulations. c.) using only the French drain would never achieve cleanup. In addition, it was a waste of money to be currently treating "clean water". d.) DOE should either "Do Nothing", or propose an active cleanup scheme. To do the "Do Nothing" alternative, DOE would have to show "Technical Impracticability". An addendum to the FS would have to be prepared and a new draft PP would be submitted.

Leon indicated that the DNAPLs are relatively stable and to cleanup such small volumes would probably meet the TI criteria. C. Gilbreath indicated that the EPA would have to waive ARAR's to do this. In addition, how could DOE argue that a cleanup was TI when excavation of the entire plume area was possible as detailed in alternative 5 of the PP. Kleeman indicated that total excavation probably wasn't necessary and from an ecological stand point would be worst than the existing plume. Again, he recommended a study into some type of well extraction SVE system which would provide some but not total remediation, that could be completed in a finite period of time, admitting, some ARARs would need to be waived.

George made the proposal that DOE drop the preferred alternative since this was in essence "doing nothing" but costing over \$5M over 30 years. Instead, DOE would look at one of the other proposed alternatives or the TI issue. After deciding that, indeed the TI issue was not feasible, DOE would submit a new Draft Proposed Plan with a new preferred alternative. DOE would also look at the plume data to determine actual extents.

Kleeman proposed that DOE no longer treat the French drain water. DOE should continue to collect the water, test it in the storage tanks, then release the water if it passed ARARs to the SID. George and Gilbreath agreed with this suggestion. George will initiate a letter to the other agencies finalizing this proposal.

Discussion on the new proposed monitoring wells was tabled since the wells may no longer be needed.

DOE proposed reducing the well monitoring schedule from monthly to quarterly. Originally, the requirement was quarterly. All parties agreed to this proposal. Again, George will follow up with a letter to the agencies for formal approval.

DOE proposed that the wetlands report be deleted. After discussion, and input from J. Krause, it was decided that the report was still needed, but a very short report could be submitted. In the future, this work would be the responsibility of the site monitoring group rather than OU-1. The report is due 4th quarter 1995.

The meeting closed with action items. No new meeting date was set.

Individual discussions were held between working group members after formal meeting closure.

Action Items:

EG&G to submit new schedule, working towards a ROD this FY to D. George, who will forward to CDPHE and to EPA for comments.

George to submit letter to EPA and CDPHE proposing formal reduction in well monitoring schedule and stoppage of treatment for clean French Drain water.

DOE will continue to monitor and report on wetland.

DOE, EG&G, D&M will pursue other clean up alternatives. Research will involve TI issues, costs, and potential for effective clean up. A addendum to the CMS/FS will be prepared. This addendum will include project duration, scope, cleanup objectives and proposed ARAR waivers. A new draft Proposed Plan will be prepared with a new preferred alternative. No schedule is assigned for this work, but a new meeting will probably need to take place the week of April 24, 1995.

EPA and CDPHE will provide a response to DOE on the sitewide issue concerning ARAR's and POC.

EPA will provide DOE comments on the Final CMS/FS Report and Draft Proposed Plan.